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5/23/03

FELDMAN, WASSER, DRAPER & BENSON

ATTORNEYS AND COUNSELORS AT LAW

May 23, 2003

William Ryczek
Emergency Enforcement & Support Section
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Of Counsel

**Re: Clayton Chemical Company CERCLA Site;
CERCLA 104 Information Requests**

EPA Region 5 Records Ctr.



285410

Dear Mr. Ryczek:

I write concerning the CERCLA 104(e) information request that your Agency has sent to Mr. Charlie Stock, received by him on or about May 19th, and referred on to me. I note that you have sent a similar inquiry to Specialty Waste Services, Inc., Attorney Sheldon Korlin, RRG, and others. Sheldon Korlin has represented Mr. Stock in the past and continues as his counsel in other matters. However, I have been tasked to address this current situation.

Mr. Stock is a disappointed investor who purchased a minority position in an LLC known generally as "RRG". Initially, that interest in RRG was purchased personally; but shortly after it began operating, his entire interest was moved into an irrevocable trust. The RRG entity sought to bring the old Clayton Chemical Company site in Sauget, IL back to life, operating in the false belief that it had the cooperation of the Illinois EPA. It did not, as it developed, and IEPA aggressively sought to put RRG out of business. It succeeded. Mr. Stock lost more than his entire investment and has closed the book on this sad chapter.

Importantly, Mr. Stock had no operational responsibilities at the site in question and did not run the business. He possesses no documents or records concerning same. Thus, he has very little knowledge upon which to base answers to any of the questions posed by your Agency.

That being the case, the following answers are offered by my client, presented in the order they were posed, and without restating the question:

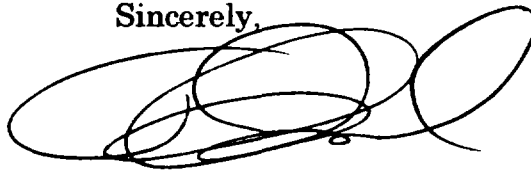
1. Attorney Tom Immel.
2. None.
3. Attorney Korlin might prove more knowledgeable on some matters – see below. Tom Lightfoot ran the day-to-day operations of RRG.
4. Mr. Stock has none. Unknown as to others.
5. Unknown.
6. Unknown.
7. No as to Mr. Stock. Unknown as to others.
8. and 8A. NA.
9. Unknown. Mr. Stock maintained no commercial general liability policies for himself. We believe this is the type of policy being inquired into.
10. Mr. Stock's personal tax returns are not a proper subject for this inquiry. Unknown as to others.
11. NA.
12. NA.
13. NA.
14. None as to Mr. Stock. Unknown as to others.
15. None.
16. Mr. Stock did not own, operate or lease the Site. As to other persons or entities, no documents are controlled by or in the possession of Mr. Stock. Refer to Mr. Korlin.
17. Unknown; no documents in Mr. Stock's possession.
18. Unknown; no documents in Mr. Stock's possession.
19. Unknown, except that Mr. Stock believes that RRG purchased the assets of Clayton Chemical Company at the end of 1996; no documents in Mr. Stock's possession.
20. Unknown-see response to No. 19; no documents in Mr. Stock's possession.
21. Unknown, except that at the end of 1996 (approx.) RRG was purchasing assets from Clayton Chemical Company that included a RCRA Part B Permit; no documents in Mr. Stock's possession.
22. Unknown; no documents in Mr. Stock's possession.
23. Unknown; no documents in Mr. Stock's possession.
24. Unknown; no documents in Mr. Stock's possession.
25. No.
26. Unknown.

- 27. Unknown.
- 28. Unknown.
- 29. Unknown.
- 30. Documents control. Not in Mr. Stock's possession. Refer to Mr. Korlin.
- 31. Unknown.
- 32. Documents control. Not in Mr. Stock's possession. Refer to Mr. Korlin.
- 33. Documents control. Not in Mr. Stock's possession. Refer to Mr. Korlin.
- 34. No question with this number.
- 35. Unknown. Mr. Korlin might know more.
- 36. Not known with certainty. Mr. Korlin might be better able to answer.
Mr. Stock believes that RRG is insolvent and has not been operating since 1998?

Mr. Stock is not possessed of any other information. He does indicate that there had once been a bank account established for the benefit of IEPA, a closure fund. He understands that IEPA removed that fund – in excess of \$140,000 – from the bank; and he'd like to know what they did with it. Might you know?

Please feel free to contact me regarding this matter.

Sincerely,

A handwritten signature in dark ink, consisting of several overlapping loops and a long horizontal stroke at the bottom.

Thomas J. Immel

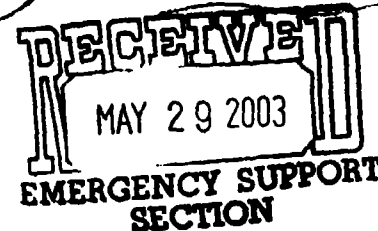
CC: Charlie Stock

Mr. Tom Turner
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